

RE: Docket MM 99-325 (IBOC Digitalization)

My name is Ted M. Coopman. I have a masters degree in Mass Communication from San Jose State University. I have been study broadcasting issues and policy since 1993 and have had my work published in The Journal of Broadcasting and Electronic Media, the Journal of Radio Studies, and the American Communication Journal. I am a Board member of the American Communication Association and am active in several other professional communication associations. I have been accepted to several Ph.D. programs and will be starting in one of them in the fall of 2002. My area of expertise is emergent community media and its intersection with federal regulation, law, and policy.

I am writing to express my concern over the proposal to convert the analog normal band spectrum to digital. This massive undertaking would be a major transformation of radio broadcasting in the US, rendering every AM/FM radio receiver and transmitter obsolete. This undertaking has several major flaws that make its implementation problematic. These include, but are not restricted to, the lack of a public mandate or demand, cost versus benefits of implementation, and the incompatibility with dominant global system.

#### Lack of Public Mandate

Despite all the excitement by the media lobby and electronic manufactures, there is no identifiable public demand for In-Band-on-Channel Digital Audio Broadcasting (IBOC-DAB). In fact, the only measurable public demand is for radio programming that is more engaging and has fewer commercials, not "CD quality" pitches for cars and beer. DAB in other world markets, most notably Europe, has been a sad disappointment. When given a choice, most people do not see the benefits of DAB. I would argue that the reason for IBOC is that broadcasters and electronics companies know that if they gave Americans a choice, they would stick to analog radio. This is why they want to force the public into this new realm. If anything, IBOC could finish what consolidation started and kill radio completely.

#### Cost Versus Benefits

A cost benefit analysis of this plan clearly shows that a very narrow group of broadcasters and makers of electronics would be the only ones to benefit from conversion. The potential financial gains are huge. Every American who wanted to listen to radio would have to buy a new unit, likely multiple units. Broadcasters would be able to essentially abandon free radio and put more effort into using their bandwidth for ancillary services, services they can charge for. On the other end is the American consumer who would find his or her investment in typically long lasting radio receivers made worthless. Then there are the hundreds of public, community, religious, and college radio stations that would have to come up with tens or hundreds of thousands of dollars to stay on the air. There is talk that the Government might help these stations, but this would only be a subsidy for those who are invested in IBOC. More than likely they would be forced to sell or abandon their licenses to the very forces pushing this initiative.

#### Global Incompatibility

In a global market place, standards rule. If we adopt IBOC we will be one of two nations using it. The rest of planet will be using the Eureka 147 system. This means that Americans will be paying top dollar for equipment while the rest of the world benefits from the economy of scale of being on the same system. In the 21st century, such an idea is sheer folly. We would be subsidizing a few corporations into making a killing off the American public, who will have no place else to go for their equipment because everyone else's electronics would be incompatible. To design such a stand alone system make absolutely no sense, in fact, such a move may be a violation of World Trade Organization agreements as intentional barriers to imports.

There is of course the question of the basic technical merits of the proposed system. Interference effects in the area of the test transmitters appear to be severe. Rather than a smooth transition without static from station to station, it sounds like a wood shop in high gear. There is also the issue of the effects on analog stations by nearby IBOC dual converted stations. Current listener patterns and audiences, both inside and outside of official contours, would be greatly disrupted. In short, conversion would be a mess.

I ask you to consider who supports this idea. It is not those who simply feel this is an efficient use of spectrum, it is those who have a direct financial stake in the proposed system being adopted and forced down the throats of Americans. As we have seen in other global markets, people will not pay or change their habits to listen to DAB. The National Association of Broadcasters and manufactures know this. So in order to get this system to work and make a lot of money, they must convince the FCC to force people to switch to DAB.

I join and endorse the comments made by National Public Radio, the Amherst Alliance, and the Virginia Center for the Public Press in urging you to reject conversion of the analog AM/FM band to digital and to make a policy, like the European Union, to preserve the analog AM/FM band. If the proponents of DAB have such huge faith in its future, let them stand alone and sell DAB to the American public on another piece of spectrum, rather than getting the FCC to force us into adopting a system most don't know about and few would want.

Respectfully,  
Ted M. Coopman